

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FINNAVATIONS LLC,

Plaintiff,

vs.

BILL.COM, INC.

Defendant.

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Case No:

PATENT CASE

COMPLAINT

Plaintiff Finnnavations LLC (“Plaintiff” or “Finnnavations”) files this Complaint against Bill.com, Inc. (“Defendant” or “Bill.com”) for infringement of United States Patent No. 9,569,755 (hereinafter “the ‘755 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with an office located at 3415 Custer Rd., Suite 120-B, Plano, Texas 75023.

4. Upon information and belief, Defendant is a Delaware corporation with its principal place of business at 1810 Embarcadero Road, Palo Alto, CA 94303.

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted

business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this District.

COUNT I **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,569,755)**

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '755 Patent with sole rights to enforce the '755 Patent and sue infringers.

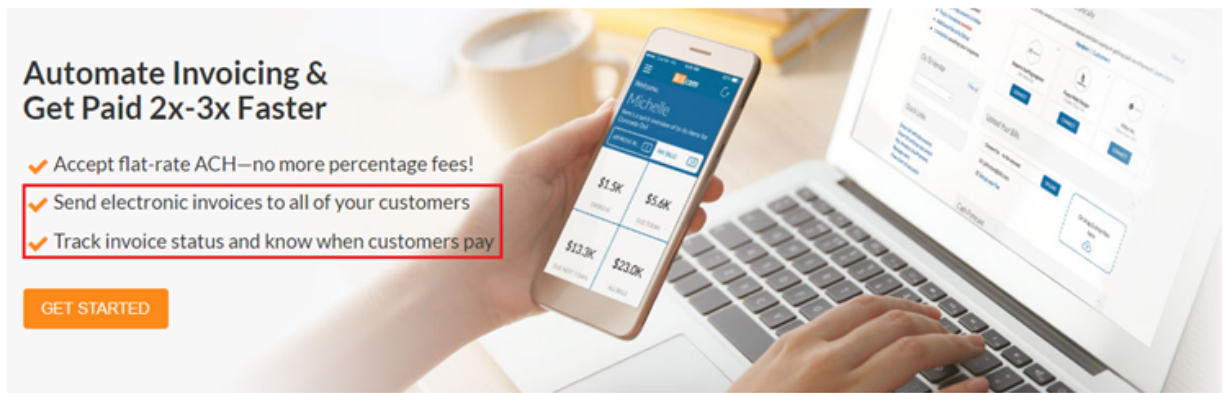
11. A copy of the '755 Patent, titled "Financial Management System," is attached hereto as Exhibit A.

12. The '755 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code. The '755 Patent was issued on February 14, 2017 after all claims of the '755 Patent overcame Examiner's claim rejections under 35 USC § 101 raised in the Examiner's June 14, 2016 non-final rejection.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims, including at least Claims 9 and 17 of the '755 Patent by making, using, importing, selling, and/or offering for sale a financial management system, including the

Bill.com billing services platform, the Bill.com mobile and/or web applications, and any similar products and/or services (“Product”), covered by at least Claims 9 and 17 of the ‘755 Patent. Defendant has infringed and continues to infringe the ‘755 Patent in violation of 35 U.S.C. § 271.

14. Regarding Claim 9, Defendant sells, offers to sell, and/or uses the Product, which provides for delivery of transaction data (e.g., data regarding paid invoices is transferred to the Bill.com platform) to a financial management program (e.g., the Bill.com platform residing on a cloud server). Certain aspects of this element and other elements referred to below are illustrated in the following screenshots.



<https://www.bill.com/product/accounts-receivable/>

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Bill.com Search

HOME INBOX PAYABLES RECEIVABLES DOCUMENTS REPORTS NETWORK

OVERVIEW GET PAID CUSTOMERS ITEMS INVOICES RECURRING INVOICES PAYMENTS

Overview

Open Invoices **Payments Received**

Open Invoices	#	Total	Payments Received in Bill.com	Total
Overdue	18	\$38,572.50	Today	\$0.00
Due in Next 7 Days	0	\$0.00	Last 7 Days	\$0.00
Due in 7+ Days	1	\$135.00	This Month (Apr)	\$100.00
	19	\$38,707.50	Last Month (Mar)	\$0.00

<https://www.bill.com/product/accounts-receivable/>

Record Manual Payment

* AMOUNT \$375.00

* PAYMENT DATE 04/26/16

PAYMENT TYPE Check

REFERENCE NUMBER 2346

DEPOSIT TO Accounts Receivable

MEMO

Apply Payment and Credits To:



INVOICE #	INVOICE DATE	DUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
041	04/26/16	05/26/16	\$375.00	\$375.00	\$375.00	<input checked="" type="checkbox"/>


Unapplied amount: \$0.00

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

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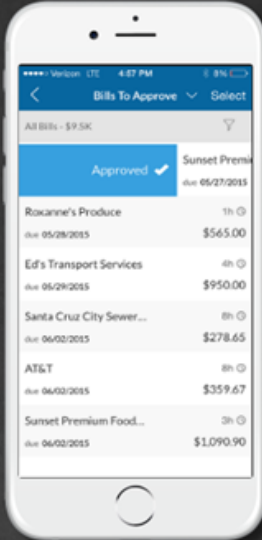
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https://www.bill.com/overview_v1/

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Check the original invoices.

https://www.bill.com/overview_v1/

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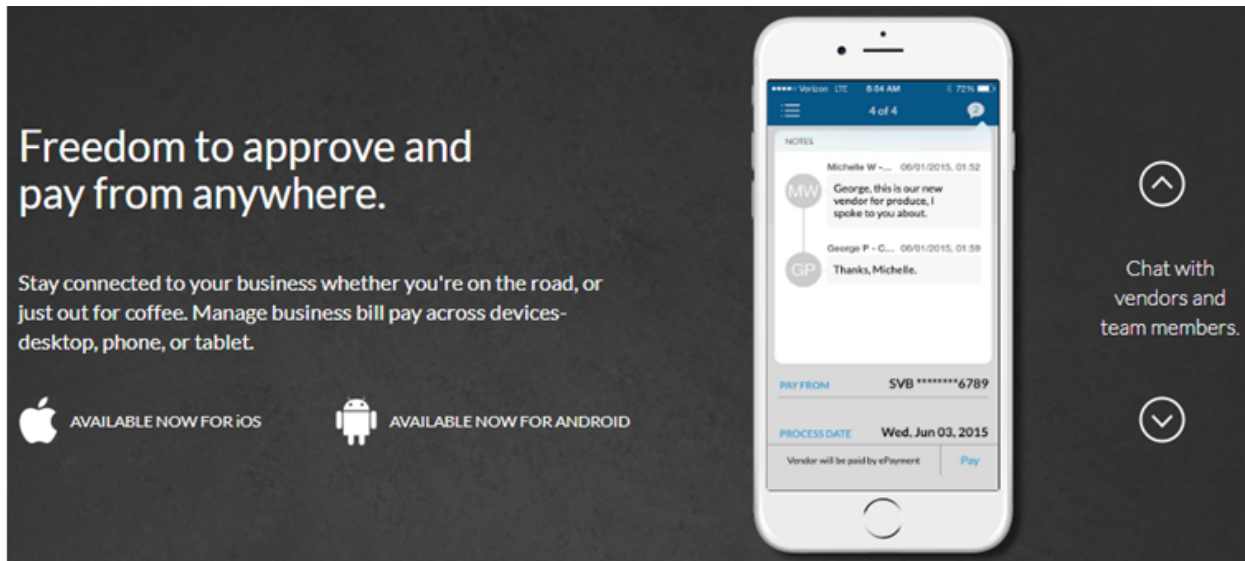
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See who else has approved, or needs to.

https://www.bill.com/overview_v1/



https://www.bill.com/overview_v1/

15. The Product uses a network device (e.g., a laptop, computer, or smartphone) to conduct an online financial transaction (e.g., a user can use the Bill.com mobile application or web application to send invoices to customers and receive payment) with a commercial web server (e.g., the processing server utilized to process a customer invoice payment). Certain aspects of these elements are illustrated in the following screenshots and/or in screen shots provided in connection with other allegations herein.

Automate Invoicing & Get Paid 2x-3x Faster

- ✓ Accept flat-rate ACH—no more percentage fees!
- ✓ Send electronic invoices to all of your customers
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GET STARTED

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REFERENCE NUMBER 2346

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Unapplied amount: \$0.00

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

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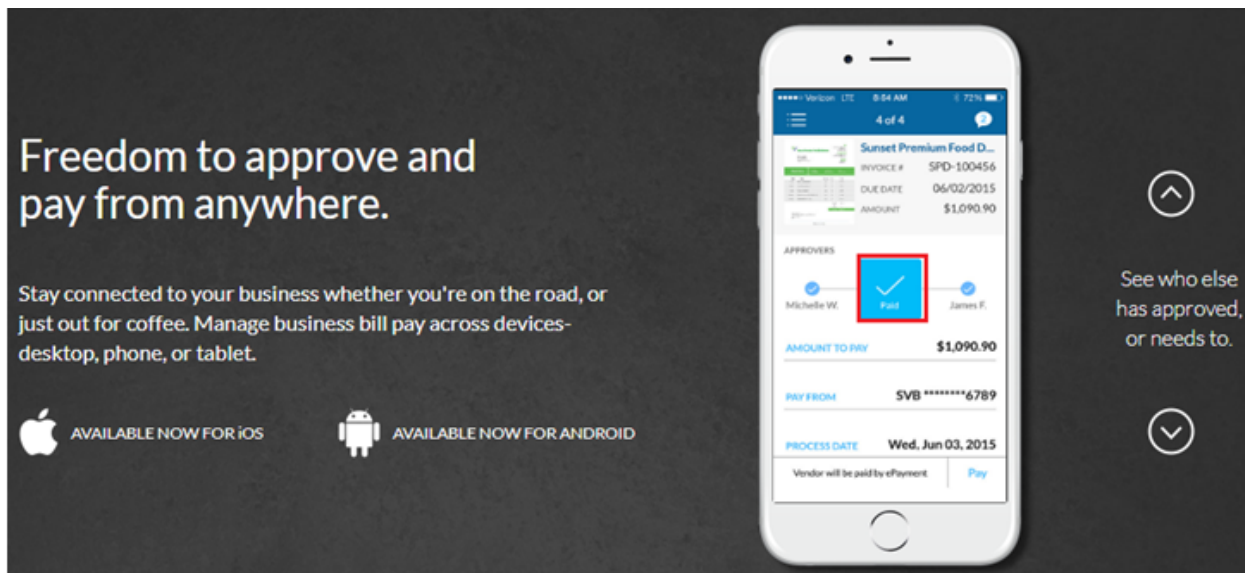
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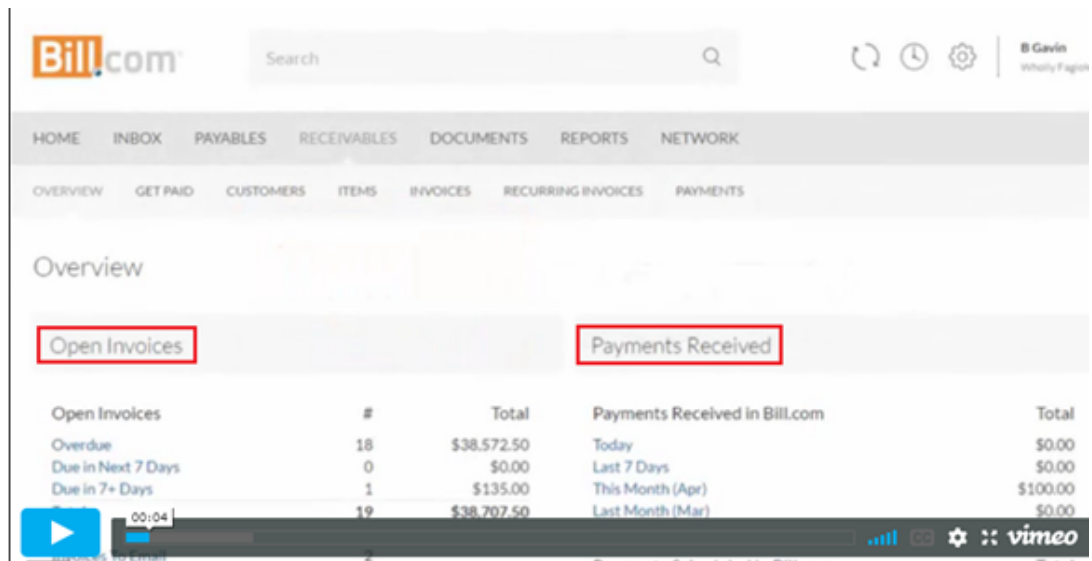
Check the original invoices.

<https://www.bill.com/overview> v1/



https://www.bill.com/overview_v1/

16. The Product utilizes a financial assistant (e.g. the Bill.com mobile application or web application) on a network device (e.g., a laptop, computer, or smartphone) to search a set of transmitted data related to online financial transactions (e.g., the Bill.com application must analyze the data transmitted during an invoice payment in order to determine and display the current status of said invoice on a user dashboard). Certain aspects of these elements are illustrated in the following screenshots and/or in screenshots provided in connection with other allegations herein.



Bill.com Search

HOME INBOX PAYABLES RECEIVABLES DOCUMENTS REPORTS NETWORK

OVERVIEW GET PAID CUSTOMERS ITEMS INVOICES RECURRING INVOICES PAYMENTS

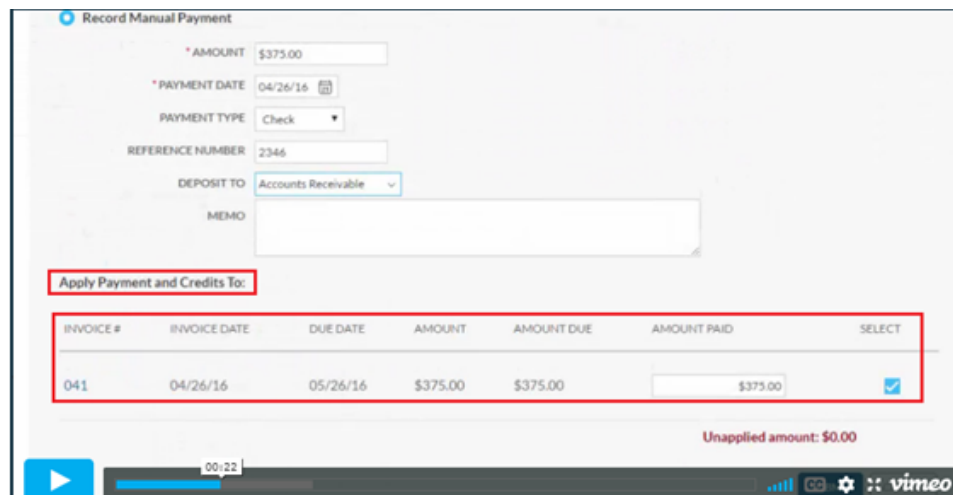
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<https://www.bill.com/product/accounts-receivable/>



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* PAYMENT DATE 04/26/16

PAYMENT TYPE Check

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DEPOSIT TO Accounts Receivable

MEMO

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INVOICE #	INVOICE DATE	DUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
041	04/26/16	05/26/16	\$375.00	\$375.00	\$375.00	<input checked="" type="checkbox"/>

Unapplied amount: \$0.00

00:22

<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

17. The financial assistant on the network device determines whether the searched data comprises transaction data for the online financial transaction (e.g., the Bill.com application must determine if a particular invoice payment data is related to a particular invoice so that it can correlate a particular payment to particular invoice and display the status of said invoice accurately). Certain aspects of these elements are illustrated in the following screenshots and/or in screenshots provided in connection with other allegations herein.

The screenshot shows the Bill.com Overview page. At the top, there is a search bar and navigation tabs for HOME, INBOX, PAYABLES, RECEIVABLES, DOCUMENTS, REPORTS, and NETWORK. Below these are sub-tabs for OVERVIEW, GET PAID, CUSTOMERS, ITEMS, INVOICES, RECURRING INVOICES, and PAYMENTS. The Overview section displays two summary cards: 'Open Invoices' and 'Payments Received'. The 'Open Invoices' card shows a table with columns for status, count, and total amount. The 'Payments Received' card shows a table with columns for payment type and total amount.

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<https://www.bill.com/product/accounts-receivable/>

The screenshot shows the 'Record Manual Payment' form in Bill.com. The form includes fields for AMOUNT (\$375.00), PAYMENT DATE (04/26/16), PAYMENT TYPE (Check), REFERENCE NUMBER (2346), and DEPOSIT TO (Accounts Receivable). Below these fields is a section titled 'Apply Payment and Credits To:' which contains a table with columns for INVOICE #, INVOICE DATE, DUE DATE, AMOUNT, AMOUNT DUE, AMOUNT PAID, and a SELECT checkbox. The table shows one invoice (041) with an amount of \$375.00, which is fully paid. The 'Unapplied amount' is \$0.00.

INVOICE #	INVOICE DATE	DUE DATE	AMOUNT	AMOUNT DUE	AMOUNT PAID	SELECT
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<https://support.Bill.com.com/hc/en-us/articles/217545097-Client-View-Paying-by-Credit-Card-with-Bill.com-Payments>

18. When searched data (e.g., transaction data related to invoice payments) comprises transaction data in a first data structure (e.g., the data structure utilized to consummate a credit card payment on a processing server) compatible with conducting the online financial transaction (e.g., the online payment of an invoice), the financial assistant (e.g., the Bill.com application operating on a computer, laptop, or smartphone) copies the transaction data (e.g., basic information included in the credit card payment of an invoice such as the payment amount) and additional transaction data not included in the transmitted

transaction data (e.g., the Bill.com application will combine basic information such as the payment amount with other information relating to the invoice such as the client name, and status of the invoice) into a second data structure compatible with the financial management program (e.g., the data structure utilized by the Bill.com platform to store compiled invoice data on a server and display said compiled invoice data on a mobile or web application).

19. Regarding Claim 17, Defendant utilizes a network device that is at least one of a terminal device (e.g., smartphone, laptop or computer) and a computer server (e.g., server hosting the Payoneer platform). Certain aspects of these elements are shown above in connection the paragraphs discussing Claim 9 and the screen shots provided below and elsewhere herein.

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Bill.com Search

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Record Manual Payment

*AMOUNT \$375.00

*PAYMENT DATE 04/26/16

PAYMENT TYPE Check

REFERENCE NUMBER 2346

DEPOSIT TO Accounts Receivable

MEMO

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Unapplied amount: \$0.00

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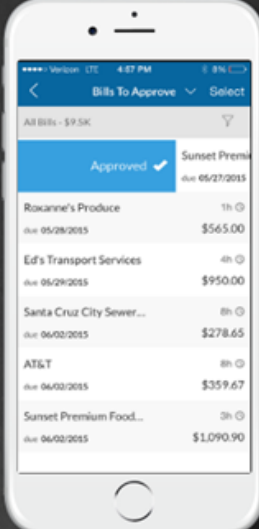
Check the original invoices.

https://www.bill.com/overview_v1/

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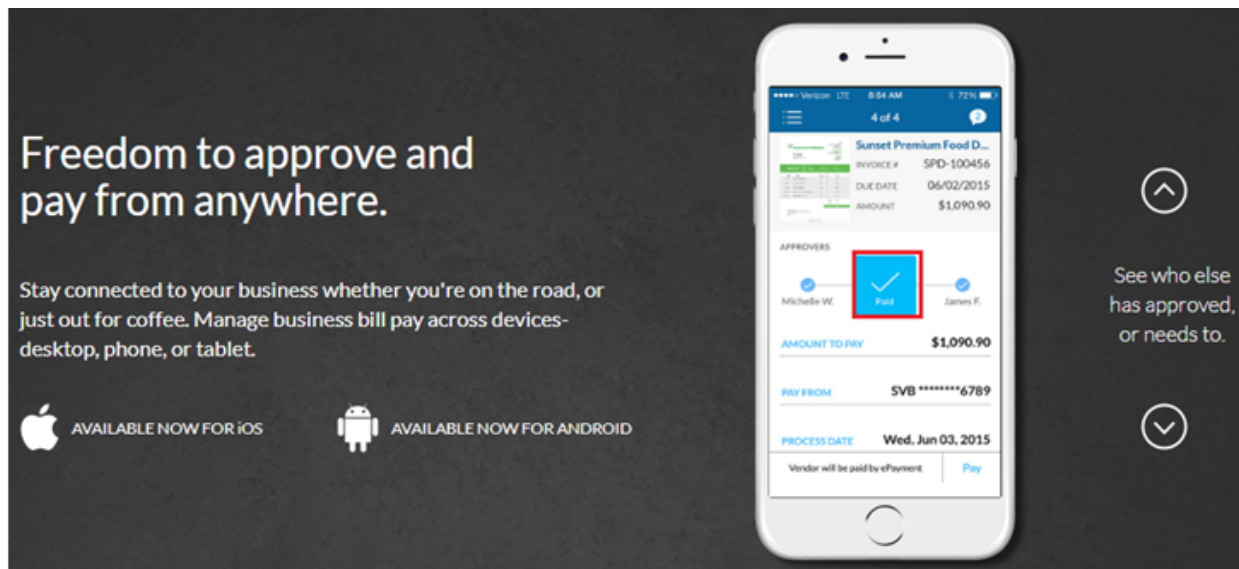
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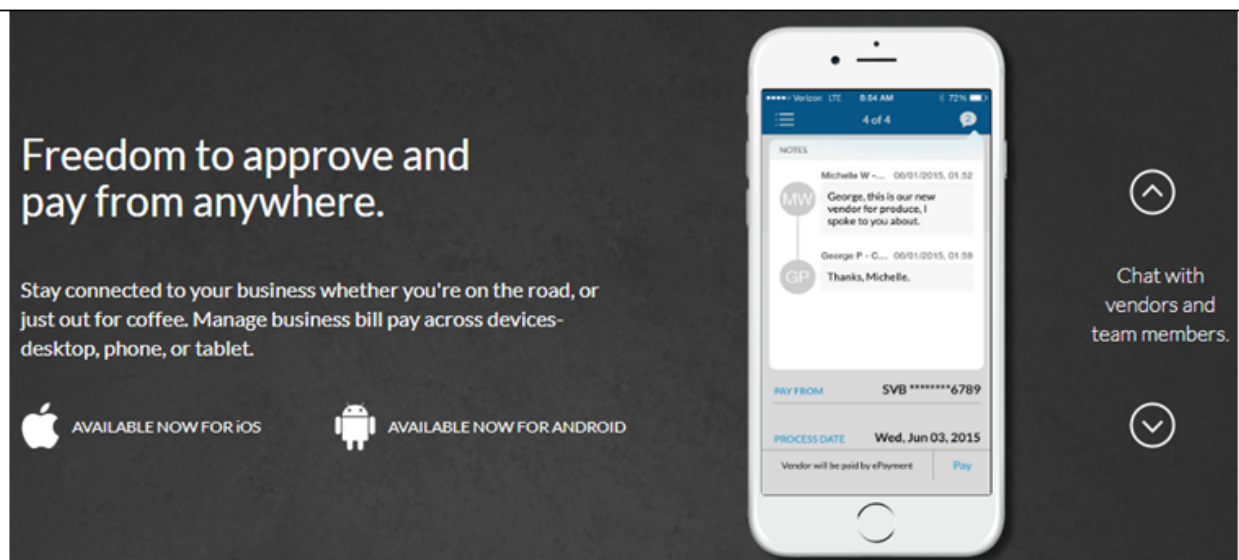


Approve, pay, or deny bills with a swipe.

https://www.bill.com/overview_v1/



https://www.bill.com/overview_v1/



https://www.bill.com/overview_v1/

20. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

21. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

22. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order Enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,569,755 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: March 22, 2018

Respectfully submitted,

/s/ Stamatios Stamoulis

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